

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON MATTERS ARISING FROM THE REPORTS OF THE COMMISSION, THE EXECUTIVE COMMITTEE AND THE SUBSIDIARY BODIES: REPORT OF THE PHYSICAL WORKING GROUP ON ANTIMICROBIAL RESISTANCE (AMR)

Comments of Tanzania, African Union and Health for animals

TANZANIA

CAC39 re-established the Ad-hoc Intergovernmental Task Force on Antimicrobial Resistance to be chaired by South Korea. A physical working group chaired by the United Kingdom and co-chaired by Australia and the United States was also established by CAC40. The PWG reviewed and revised the following project documents:

- Proposal for new work on the revision of the Code of Practice to Minimise and contain Antimicrobial Resistance (CAC/RCP 61-2005); and
- Proposal for new work on the Guidance on Integrated Surveillance of Antimicrobial Resistance.
- The Terms of Reference for the Provision of Scientific Advice on Antimicrobial Resistance.

Position: Tanzania supports the adoption of the three documents.

RATIONALE: Antimicrobial Resistance has direct impact on food safety. As the apex body responsible for developing international food safety standards, the Codex Alimentarius Commission needs to revise its current standards to better reflect the emerging issues in the field of AMR. Moreover, guidance is needed to enable countries develop practical national AMR strategies capable of minimizing and containing antimicrobial resistance. Some countries have already developed their national AMR action plans whilst others are in the process of doing so. Harmonization of AMR guidance documents is important in ensuring a unified approach in addressing the public health threat of AMR. Such unified guidance should be based on science and should be practicable and flexible, taking into account the different levels of development with respect to capacities for addressing AMR issues at the country level.

AFRICAN UNION

BACKGROUND: CAC39 (2016) re-established the Adhoc Intergovernmental Task Force on Antimicrobial Resistance to be chaired by South Korea. A physical working group chaired by the United Kingdom and co-chaired by Australia and the United States was also established by CAC40. The pWG reviewed and revised the following project documents:

- Proposal for new work on the revision of the Code of Practice to Minimise and contain Antimicrobial Resistance (CAC/RCP 61-2005); and
- Proposal for new work on the Guidance on Integrated Surveillance of Antimicrobial Resistance.

The working group also reviewed and revised the Terms of Reference for the Provision of Scientific Advice on Antimicrobial Resistance.

POSITION: African Union supports the adoption of the three documents.

RATIONALE: Antimicrobial Resistance has direct impact on food safety. As the apex body responsible for developing international food safety standards, the Codex Alimentarius Commission needs to revise the current standards on AMR to better reflect the emerging issues in the field of AMR. Moreover, guidance is needed to enable countries to develop practical national AMR strategies capable of minimizing and containing antimicrobial resistance. Some countries have already developed their national AMR action plans whilst others are in the process of doing so. Harmonization of AMR guidance documents is important in

ensuring a unified approach in addressing the public health threat of AMR. Such unified guidance should be based on science and should be practicable and flexible, taking into account the different levels of development with respect to capacities for addressing AMR issues at the country level.

HEALTH FOR ANIMALS

HealthforAnimals is the international non-profit organization that represents the animal health sector: manufacturers of veterinary pharmaceuticals, vaccines and other animal health products. The animal health industry provides value to society by protecting animals and as a consequence, humans, from diseases.

HealthforAnimals congratulates the chair and co-chairs of the PWG on Codex work on AMR for the excellent work conducted in London in 2017 by the PWG. HealthforAnimals has the following comments regarding the proposals for new work for the Executive Committee and the Codex Commission.

HealthforAnimals supports the establishment of one or two electronic working groups (eWG) to start elaborating new texts after the Commission has approved the proposals of the PWG. HealthforAnimals has the following points regarding subsequent work:

1. The Task Force and the eWG should operate in a transparent and open manner that allows all interested parties (governments and observer organizations) to participate in the development, review and approval of proposed texts. The process must be inclusive. If any one group is seen to be overly influencing direction or content, there will not be wide support and progress may be slower. Specifically, it is important to ensure balance in the drafting groups, considering regions, economic development and public/private role.
2. The work of the Task Force should be completed strictly within the Codex mandate: AMR as it relates to foods and consumer protection, whilst paying attention to trade.
3. The revision of the Code of Practice should ensure coherence and consistency with already widely accepted and globally applied Codes and practices and not duplicate existing work. All relevant organizations must be involved, including in scientific advice. As regards the revision of the Code of Practice CAC/RCP 61-2005, specific attention should be brought to ensuring consistency with the Terrestrial and Aquatic codes of the World Animal Health Organization (OIE).
4. The work should be firmly science-based. If the results are not, they will not secure wide support and the credibility of Codex may be affected. Scientific advice must be sought on the points where data are missing, like the use of antimicrobials in plant protection. On the questions of the different lists and related risk management recommendations to be elaborated by the Codex Task Force, a balanced tripartite meeting of the FAO/WHO/OIE organizations could help develop proposals for the TFAMR

Regarding the different outcomes of the Task Force, the drafting groups and the electronic working groups should pay special attention that the advice be flexible, practical and realistic for all countries.

Appendix 1: UPDATE TO CODES OF PRACTICE CAC/RCP 61-2005

HealthforAnimals strongly supports the following points:

- Development of risk-based guidance based on scientific advice
- Adherence to the Codex mandate of food safety and fair trade
- Collaboration with OIE to minimize duplication, avoid contradiction and ensure coherence
- Focus on practical and implementable actions for the widest benefit
- The current structure and approach to organization of content in CAC/RCP 61-2005 should be maintained as it will facilitate work and is consistent with existing OIE texts. HealthforAnimals recommends to list and hierarchize the different risk management measures in each chapter, in order to help Member States to adapt their national measures to their local situation.
- A careful approach to the risk management of the different antimicrobial classes should be taken. It will need to allow flexibility for Member States to adapt to their local use and situation. Due attention should be paid to the WHO and the OIE list but also to the experience that many of the Member States have had of setting up lists. HealthforAnimals emphasizes that the availability of enough antimicrobial classes to farmers and veterinarians is essential to food production and eventually contributes to food safety by maintaining or restoring the health of animals. In this respect, we will pay attention that risk management measures for consumer protection remain balanced.

- The continued availability of effective antimicrobial drugs is vital to combat infectious disease in both humans and animals. This needs to be considered in particular as regards measures for the veterinary pharmaceutical industry and for regulatory authorities.
- The previous Code of Practice includes definitions on prophylaxy, therapeutic use and growth promotion. These definitions need to be reviewed and made fully consistent with OIE definitions. It is important in particular to have a definition of prophylaxy within the framework of prudent use of antimicrobials that can distinguish it from growth promotion.

Appendix 2: SURVEILLANCE

Appendix 2: HealthforAnimals supports the principle of integrated surveillance through monitoring and surveillance of antimicrobial resistance and use.

HealthforAnimals will remain very attentive that the work of Codex does not focus on technicalities of surveillance which are well developed by AGISAR, but instead on helping countries develop a stepwise approach together with the appropriate capacities, in particular in developing countries.

There are already several texts giving technical guidance on AMR surveillance, like WHO Advisory Group on Integrated Surveillance of Antimicrobials (AGISAR) publications, WHO Global Antimicrobial Resistance Surveillance System publications, and World Organization for Animal Health Chapter 6.7, "Harmonization of National Antimicrobial Resistance Surveillance and Monitoring Program". The TFAMR should focus on providing high level principles on how to use such technical guidance, in particular indicating:

- What capacities are necessary to establish the surveillance programs
- What priorities should be set in terms of surveillance?
- What points are essential for being able to compare resistance data. In particular in explaining the difference among microbiological endpoints like cut-off values or clinical breakpoints.
- Risk communication to stakeholders on how to interpret data but also on consumer protection, as such surveillance programs would be focused on food-borne hazards.

Regarding Antibiotic usage monitoring, reference should be made to the OIE work and the OIE global database, in recommending that countries mirror the OIE requests in their national plans. It has been recognised that there are natural limitations to such a data collection exercise, for example that data and metrics are not consistent across countries, or that some countries do not have the capacity to collect and assess data.